



## WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

6 May 2021

Appeals Convenor  
Office of the Appeals Convenor  
Level 22 Forrest Centre  
221 St Georges Terrace  
PERTH WA 6000

Attn: Emma Gaunt

Re: CPS 6753/2 Main Roads Western Australia

### **Introduction**

The Wildflower Society of WA (WSWA) hereby appeals the Clearing Permit (CPS 6753/2) granted by the Department of Water and Environmental Regulation (DWER) to Main Roads Western Australia (MRWA), as a 5-year extension to the previously-granted permit (CPS 6753/1). Our concerns mainly relate to the currency/adequacy of survey data and the lack of offsets for residual impact.

### **Currency of Survey Data**

The original assessment was based on surveys by GHD in 2014. These surveys identified nine priority flora taxa in the survey area, with two likely to be impacted by the proposed clearing. We believe that more recent survey data needs to be assessed because: recent queries of the Naturemap utility reveals other priority taxa not present in the original GHD survey; and furthermore, the Decision Report for CPS 6753/2 notes that there are 28 conservation-significant taxa in the local area, not nine, as originally indicated, the closest of which (*Eremophila retropila*) did not appear in the original flora survey report.

To our knowledge, other entities applying for clearing permits in the area, such as mining companies, have been requested to resurvey areas when their survey data are of a similar age. Hence, we assert that the new assessment for such a wide-ranging permit should also be based on the most recent data possible (i.e. new survey data).

### **Residual Impacts not Offset**

The original Decision Report (CPS 6753/1), which has been referred to by the current permit (version 2), noted that the clearing is at variance with Clearing Principles (a) and (b). Although the impacts were claimed to not represent a significant impact, it is clear that residual impacts could remain. For example, in the assessment against Clearing Principle (a) it is stated in reference to recommendations raised by the EIA that: "Some of these issues are considered in the EMP provided by the applicant, however insufficient detail is provided to ensure that these commitments will adequately mitigate impacts to CGAs". The "CGA" referred to is the calcrete groundwater assemblages, which were P1 ecological communities.

Following the State offset guidelines, all modern clearing permits would likely require an environmental offset for these potential impacts; however, no offset is specified or required by this permit. The WSWA contends that Provision should be made to offset any potential loss through contribution of nature conservation/land acquisition in the area.

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### **Other Concerns**

Our final concern is that techniques and standards for road construction have changed since the original project proposal. We note that the original clearing width is generally about 23 m, but it is likely that with application of newer techniques the area required could be reduced in comparison with that proposed in 2016.

### **Conclusion**

**The Wildflower Society of Western Australia seeks to have this Permit CPS 6753/2 cancelled that the proponent be requested to provide up-to-date biological survey information, together with revised road designs and specifications, to allow a new permit application to be assessed and consideration of current conditions for works of this nature to be included.**

Yours sincerely



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